



**Service of Process  
Transmittal**

11/19/2020

CT Log Number 538621777

**TO:** Kim Lundy Service Of Process  
Walmart Inc.  
702 SW 8TH ST  
BENTONVILLE, AR 72716-6209

**RE: Process Served in Georgia**

**FOR:** Wal-Mart Stores East, LP (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Harrell Angela, Pltff. vs. Walmart Stores East L.P., etc. and Reddy Ice, LLC, Dfts.  
*Name discrepancy noted.*

**DOCUMENT(S) SERVED:** Summons, Complaint, Motion(s), Order(s)

**COURT/AGENCY:** Coffee County - Superior Court, GA  
Case # SUV2020000619

**NATURE OF ACTION:** Personal Injury - Slip/Trip and Fall - 11/28/2018 - 1450 Bowens Mill Rd SE, Douglas, GA 31533 in Coffee County, Georgia store

**ON WHOM PROCESS WAS SERVED:** The Corporation Company (FL), Cumming, GA

**DATE AND HOUR OF SERVICE:** By Process Server on 11/19/2020 at 13:30

**JURISDICTION SERVED :** Georgia

**APPEARANCE OR ANSWER DUE:** Within 30 days after service, exclusive of the day of service

**ATTORNEY(S) / SENDER(S):** Bradford Thomas  
Fried Rogers Goldberg LLC  
3550 Lenox Road NE  
Suite 1500  
Atlanta, GA 30326  
404-591-1800

**ACTION ITEMS:** CT has retained the current log, Retain Date: 11/19/2020, Expected Purge Date: 11/24/2020  
  
Image SOP  
  
Email Notification, Kim Lundy Service Of Process [ctlawsuits@walmartlegal.com](mailto:ctlawsuits@walmartlegal.com)

**SIGNED:** The Corporation Company (FL)  
**ADDRESS:** 1999 Bryan St Ste 900  
Dallas, TX 75201-3140

**For Questions:** 877-564-7529  
[MajorAccountTeam2@wolterskluwer.com](mailto:MajorAccountTeam2@wolterskluwer.com)

Page 1 of 1 / DL

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

Exhibit "A"

**SUPERIOR COURT OF COFFEE COUNTY  
STATE OF GEORGIA**

**FILED IN OFFICE**  
CLERK OF SUPERIOR COURT  
COFFEE COUNTY, GEORGIA  
**SUV2020000619**

**NOV 17, 2020 10:39 AM**

  
Elisa Gillis, Clerk  
Coffee County, Georgia

CIVIL ACTION NUMBER SUV2020000619

Harrell, Angela

**PLAINTIFF**

**VS.**

Walmart Stores East L.P., DBA Walmart  
Supercenter  
Reddy Ice LLC

**DEFENDANTS**

**SUMMONS**

TO: WALMART STORES EAST L.P.


You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Bradford Thomas  
Fried Rogers Goldberg LLC  
3550 Lenox Road NE  
Suite 1500  
Atlanta, Georgia 30326**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If this action pertains to a Protective Order, the Answer is to be filed and served on or before the scheduled hearing date attached. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

**This 17th day of November, 2020.**

Clerk of Superior Court



Elisa Gillis, Clerk  
Coffee County, Georgia

 **EFILED IN OFFICE**  
CLERK OF SUPERIOR COURT  
COFFEE COUNTY, GEORGIA  
**SUV2020000619**

**NOV 17, 2020 10:39 AM**

  
Elisa Gillis, Clerk  
Coffee County, Georgia

**IN THE SUPERIOR COURT OF COFFEE COUNTY  
STATE OF GEORGIA**

ANGELA HARRELL,

Plaintiff,

v

WALMART STORES EAST L.P. d/b/a  
WALMART SUPERCENTER and REDDY ICE,  
LLC

Defendants.

**JURY TRIAL DEMANDED**

CIVIL ACTION  
FILE NO.

**COMPLAINT**

COMES NOW ANGELA HARRELL, ("HARRELL"), Plaintiff in the above-styled action, and files this Complaint for Damages against Defendants WALMART STORES EAST L.P., d/b/a WALMART SUPERCENTER ("WALMART") and REDDY ICE, LLC ("REDDY") showing the Court as follows:

1.

WALMART STORES EAST L.P. is a foreign profit corporation, its principal office being 708 SW 8<sup>th</sup> Street, Bentonville, AR 72716 is registered and doing business in the State of Georgia, is a joint tortfeasor, and is subject to the jurisdiction of this Court. WALMART STORES EAST L.P. transacts business in Coffee County, Georgia as Walmart Supercenter, with said business being at 1450 Bowens Mill Rd SE, Douglas, GA 31533 in Coffee County, Georgia. Additionally, it has a major distribution center in Coffee County, Georgia. Venue is proper as to this Defendant because the incident which forms the basis of this Complaint occurred there and it maintains multiple office and facilities in Coffee County. Service may be perfected upon its

registered agent, The Corporation Company, 112 North Main Street, Cumming, GA, 30040, in Forsyth County, Georgia.

2.

Defendant REDDY ICE, LLC is a Nevada limited liability company with its principal office being at 5720 LBJ Freeway, Suite 200, Dallas, Texas, 75240. It may be served through its registered agent, CT Corporation System 289 Culver Street, Lawrenceville, Gwinnett County, GA 30046-4805.

3.

Upon information and belief, at all times material hereto, Defendant WALMART STORES EAST L.P. owned, occupied, leased, and/or controlled the land which included the location more fully described as Walmart Supercenter, 1450 Bowens Mill Road, Douglas, Georgia, 31533 (the "Property"). Accordingly, Defendants owed a duty of care to Plaintiff to keep the Property reasonably safe. Defendant REDDY supplied ice to said store.

4.

On November 28, 2018, Plaintiff went to the Walmart store located at the Property during regular business hours to shop in the Walmart Supercenter, located at 1450 Bowens Mill Rd SE, Douglas, GA 31533 in Coffee County, Georgia store.

5.

Defendant Walmart has been properly served with process.

6.

Venue is proper as to Defendant Walmart.



7.

Defendant Reddy has been properly served with process.

8.

Venue is proper as to Defendant Reddy.

9.

At all times material hereto, Plaintiff was on the Property for a lawful purpose and was therefore an invitee of Defendants.

10.

Defendants owed Plaintiff a duty to exercise ordinary care to keep the premises safe.

11.

Defendant Walmart's duty to Plaintiff was non-delegable.

12.

On November 28, 2018, Plaintiff was walking by the REDDY ice machine when she slipped and fell as the rug she stepped on slipped out from under her due to liquid on the floor. Defendant Walmart has accused REDDY of being responsible for the water in front of the ice machine.

13.

As a direct and proximate result of Defendants' negligence, Plaintiff suffered physical and mental injuries, including but not limited to, bodily injuries, permanent impairment and damages, past, present, and future pain and suffering, mental anguish, loss of enjoyment of life, and other damages, for which she respectfully requests recovery in an amount to fully

compensate her for said injuries and damages in the enlightened conscience of a fair and impartial jury.

14.

At all times relevant to this incident, Plaintiff was exercising ordinary and reasonable care and was in no way comparably or contributorily negligent.

15.

Plaintiff has incurred special damages well in excess of \$50,000.00 so far as a result of Defendants' negligence. Her medical expenses continue to increase.

WHEREFORE, Plaintiff prays for relief as follows:

- a) That summons issue requiring Defendants to be and appear as provided by law to answer the allegations of this Complaint;
- b) That judgment enter in favor of Plaintiff and against Defendants in an amount within the enlightened conscious of the jury, and sufficient to fully and justly compensate Plaintiff for pain and suffering, personal injuries, permanent injury and impairment, medical expenses, loss of consortium, and all other elements of damages allowed by Georgia law;
- c) That all costs be cast against Defendants;
- d) For a trial by jury; and
- e) For such other and further relief as this Court shall deem just and appropriate.

Respectfully submitted this 17<sup>th</sup> day of November 2020.

**FRIED GOLDBERG LLC**



By: \_\_\_\_\_  
Brad W. Thomas  
Georgia Bar No. 704680

3550 Lenox Road NE Suite 1500  
Atlanta, Georgia 30326  
Telephone: (404) 591-1800  
Facsimile: (404) 591-1801  
[brad@friedgoldberg.com](mailto:brad@friedgoldberg.com)

FILED IN OFFICE  
CLERK OF SUPERIOR COURT  
COFFEE COUNTY, GEORGIA  
**SUV2020000619**

NOV 18, 2020 11:24 AM

  
Elisa Gillis, Clerk  
Coffee County, Georgia

IN THE SUPERIOR COURT OF COFFEE COUNTY  
STATE OF GEORGIA

ANGELA HARRELL,

Plaintiff,

v

WALMART STORES EAST L.P. d/b/a  
WALMART SUPERCENTER and REDDY ICE,  
LLC

Defendants.

**JURY TRIAL DEMANDED**

CIVIL ACTION  
FILE NO. SUV2020000619

**MOTION FOR APPOINTMENT OF HOLLIS HILL**  
**AS A PERSON AUTHORIZED TO SERVE PROCESS UPON DEFENDANT**

COMES NOW Plaintiff in the above-captioned lawsuit who, pursuant to O.C.G.A. § 9-11-4(c), hereby requests this Court appoint Hollis Hill with RMG Services, LLC as a person authorized to obtain service of process on Walmart Stores East L.P., d/b/a Walmart Supercenter and Reddy Ice, LLC.

Plaintiff has filed with this Court a Complaint. The Complaint was filed on November 17, 2020.

The Plaintiff shows that Hollis Hill is of the age of majority and is not an employee of Plaintiff's counsel or of Plaintiff. Hollis Hill is a citizen of the United States. Service of process will be accomplished in a lawful manner and a Return of Service will be filed with the Court.

WHEREFORE, Plaintiff requests that this Court enter an Order allowing service of process to be obtained by service upon said Defendants by Hollis Hill.

This 18<sup>th</sup> day of November 2020.



Respectfully Submitted,

**FRIED GOLDBERG, LLC**



**BRAD W. THOMAS**  
Georgia Bar No. 704680

3550 Lenox Road NE Suite 1500  
Atlanta, Georgia 30326  
(404) 591-1800  
Fax: (404) 591-1801  
Email: [brad@friedgoldberg.com](mailto:brad@friedgoldberg.com)

**IN THE SUPERIOR COURT OF COFFEE COUNTY  
STATE OF GEORGIA**

ANGELA HARRELL,

Plaintiff,

v

WALMART STORES EAST L.P. d/b/a  
WALMART SUPERCENTER and REDDY ICE,  
LLC

Defendants.

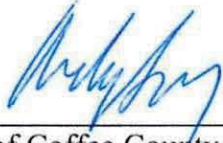
**JURY TRIAL DEMANDED**

CIVIL ACTION  
FILE NO. SUV2020000619

**ORDER**

Upon Motion of the Plaintiff to appoint Hollis J. Hill with RMG Services, LLC as a person authorized to obtain service of process on Walmart Stores East L.P., d/b/a Walmart Supercenter, and Reddy Ice, LLC this Court for good cause shown, hereby grants said Motion and appoints Hollis J. Hill as a person authorized to obtain service upon said Defendant.

SO ORDERED this 18 day of November, 2020.

  
\_\_\_\_\_  
Judge, Superior Court of Coffee County

 **EFILED IN OFFICE**  
CLERK OF SUPERIOR COURT  
COFFEE COUNTY, GEORGIA  
**SUV2020000619**

**JAN 05, 2021 04:01 PM**

  
Elisa Gillis, Clerk  
Coffee County, Georgia

**IN THE SUPERIOR COURT OF COFFEE COUNTY  
STATE OF GEORGIA**

ANGELA HARRELL,

Plaintiff,

v.

WALMART STORES EAST L.P. d/b/a  
WALMART SUPERCENTER and  
REDDY ICE, LLC,

Defendants.

Civil Action File No.: SUV2020000619

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**ANSWER AND DEFENSES OF REDDY ICE, LLC  
TO PLAINTIFF'S COMPLAINT**

COMES NOW Defendant, Reddy Ice, LLC, and files this, its Answer and Defenses to Plaintiff's Complaint as follows:

**FIRST DEFENSE**

No act or omission on the part of Defendant in any way caused or contributed to the injuries and damages sought by way of Plaintiff's Complaint.

**SECOND DEFENSE**

Plaintiff is not entitled to recover damages from Defendant as Defendant breached no duty to Plaintiff as alleged in Plaintiff's Complaint or otherwise.

**THIRD DEFENSE**

To the extent the damages sought Plaintiff were the result of Plaintiff's comparative negligence, Plaintiff's recovery against Defendant is barred or should be reduced in proportion with her degree of negligence.

**FOURTH DEFENSE**

No act or omission on the part of Defendant was the proximate cause of the injuries or damages sought by way of Plaintiff's Complaint.

**FIFTH DEFENSE**

Plaintiff is not entitled to recover from Defendant because Plaintiff's knowledge of the alleged hazard was at least equal to the knowledge of Defendant.

**SIXTH DEFENSE**

Venue is improper as to Defendant.

**SEVENTH DEFENSE**

Defendant did not own or occupy the property on which Plaintiff contends she was injured which precludes Plaintiff's recovery of damages from Defendant.

Defendant responds to the numbered paragraphs of Plaintiff's Complaint as follows:

1.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of Plaintiff's Complaint, and, therefore, cannot admit or deny same.

2.

Defendant admits the allegations contained in Paragraph 2 of Plaintiff's Complaint.

3.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations directed to Walmart contained in Paragraph 3 of Plaintiff's Complaint, and, therefore, cannot admit or deny same. Defendant denies the remaining allegations contained in Paragraph 3 of Plaintiff's Complaint. Responding further, Defendant admits that its ice was sold in Walmart stores.

4.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of Plaintiff's Complaint, and, therefore, cannot admit or deny same.

5.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of Plaintiff's Complaint, and, therefore, cannot admit or deny same.

6.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of Plaintiff's Complaint, and, therefore, cannot admit or deny same.

7.

Defendant admits the allegations contained in Paragraph 7 of Plaintiff's Complaint.



8.

Defendant admits this court represents a proper venue as the case is presently styled. Responding further, venue is not proper as to Defendant unless venue is proper as to Walmart. Defendant asserts and preserves its defense of improper venue.

9.

Defendant is without knowledge as why Plaintiff may have been on Walmart's property. Responding further, Defendant did not own or occupy the property where Plaintiff contends she was injured. Plaintiff was not an invitee of Defendant.

10.

Defendant denies the allegations contained in Paragraph 10 of Plaintiff's Complaint.

11.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of Plaintiff's Complaint, and, therefore, cannot admit or deny same.

12.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of Plaintiff's Complaint, and, therefore, cannot admit or deny same.

13.

Defendant denies the allegations contained in Paragraph 13 of Plaintiff's Complaint.

14.

Defendant is currently without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of Plaintiff's Complaint, and, therefore, cannot admit or deny same.

15.

Defendant denies the allegations contained in Paragraph 15 of Plaintiff's Complaint.

Any allegations contained in Plaintiff's Complaint not herein responded to by number, including Plaintiff's *ad damnum* and all subparts, are hereby denied.

**DEFENDANT DEMANDS A TRIAL BY A JURY.**

This 5<sup>th</sup> day of January, 2021.

Respectfully submitted,  
SWIFT, CURRIE, MCGHEE & HIERS, LLP

*/s/ William T. Casey, Jr.*

---

William T. Casey, Jr.  
Georgia Bar No.: 115610  
Monica L. Wingler  
Georgia Bar No.: 475385  
*Attorneys for Defendant Reddy Ice, LLC*

SWIFT, CURRIE, MCGHEE & HIERS, LLP  
1355 Peachtree Street, NE, Suite 300  
Atlanta, Georgia 30309-3231  
Phone: (404) 874-8800  
Fax: (404) 888-6199  
[bill.casey@swiftcurrie.com](mailto:bill.casey@swiftcurrie.com)  
[monica.wingler@swiftcurrie.com](mailto:monica.wingler@swiftcurrie.com)  
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[debbie.hobgood@swiftcurrie.com](mailto:debbie.hobgood@swiftcurrie.com)  
[arielle.salomon@swiftcurrie.com](mailto:arielle.salomon@swiftcurrie.com)

**IN THE SUPERIOR COURT OF COFFEE COUNTY  
STATE OF GEORGIA**

ANGELA HARRELL,

Plaintiff,

v.

WALMART STORES EAST L.P. d/b/a  
WALMART SUPERCENTER and  
REDDY ICE, LLC,

Defendants.

Civil Action File No.: SUV2020000619

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**CERTIFICATE OF SERVICE**

This is to certify that I have this date served counsel for the opposing party in the foregoing matter with a copy of *Answer and Defenses of Reddy Ice, LLC to Plaintiff's Complaint* via electronic filing, e-mail, and/or by depositing a copy of same in the United States mail with adequate postage affixed thereon, addressed as follows:

Brad W. Thomas, Esq.  
FRIED GOLDBERG, LLC  
3550 Lenox Road NE  
Suite 1500  
Atlanta, Georgia 30326  
[brad@friedgoldberg.com](mailto:brad@friedgoldberg.com)

*Signature on following page.*

This 5<sup>th</sup> day of January, 2021.

Respectfully submitted,

SWIFT, CURRIE, MCGHEE & HIERS, LLP

*/s/ William T. Casey, Jr.*

---

William T. Casey, Jr.  
Georgia Bar No.: 115610  
Monica L. Wingler  
Georgia Bar No.: 475385  
*Attorneys for Defendant Reddy Ice, LLC*

SWIFT, CURRIE, MCGHEE & HIERS, LLP  
1355 Peachtree Street, NE, Suite 300  
Atlanta, Georgia 30309-3231  
Phone: (404) 874-8800  
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[monica.wingler@swiftcurrie.com](mailto:monica.wingler@swiftcurrie.com)  
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[debbie.hobgood@swiftcurrie.com](mailto:debbie.hobgood@swiftcurrie.com)  
[arielle.salomon@swiftcurrie.com](mailto:arielle.salomon@swiftcurrie.com)

JAN 11, 2021 11:22 AM

  
 Elisa Gillis, Clerk  
 Coffee County, Georgia

## IN THE SUPERIOR COURT OF COFFEE COUNTY

## STATE OF GEORGIA

ANGELA HARRELL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION
	)	FILE NO. SUV2020000619
WALMART STORES EAST L.P. d/b/a	)	
WALMART SUPERCENTER and REDDY	)	
ICE, LLC	)	
	)	
Defendants.	)	
_____	)	

**WALMART STORE EAST L.P.'S ANSWER AND DEFENSES**  
**TO PLAINTIFF'S COMPLAINT**

COMES NOW, Defendant Walmart Stores East, L.P. ("Defendant" herein) and files this Answer and Defenses to Plaintiff's Complaint and shows the Court as follows:

**First Defense**

Plaintiff has asserted identical claims against Walmart Inc. in a separate action that has been removed to the United States District Court for the Southern District of Georgia, Waycross Division and as such, this action should be dismissed or consolidated. Walmart Stores East, L.P. is the only proper party to this case.

**Second Defense**

Pending additional investigation and discovery, Defendant states that Plaintiff's alleged injuries and damages were caused or contributed to by Plaintiff's own actions.

**Third Defense**

Pending additional investigation and discovery, Defendant states that Plaintiff's alleged injuries and damages were caused or contributed to by one or more third parties over whom this



Defendant had no control, and damages in this case must be apportioned pursuant to O.C.G.A. §51-12-33.

**Fourth Defense**

Defendant breached no duty owed to Plaintiff.

**Fifth Defense**

Plaintiff may not recover against Defendant because no act or omission of Defendant was the legal cause or the proximate precipitating cause of Plaintiff's alleged injuries and damages.

**Sixth Defense**

Pending further investigation and discovery, Defendants assert the defenses of contributory and comparative negligence.

**Seventh Defense**

Defendant denies that Defendant or Defendant's agents or employees were negligent in any way in connection with the incident which is the subject of this litigation.

**Eighth Defense**

Pending further investigation and discovery, Plaintiff may not recover against Defendant due to Plaintiff's equal or superior knowledge of any condition which she alleges resulted in this event.

**Ninth Defense**

Pending additional investigation and discovery, Defendant had no actual or constructive knowledge of any alleged dangerous or hazardous condition which allegedly caused Plaintiff's injuries and damages.

**Tenth Defense**

Defendant denies any and all allegations regarding negligent inspection and failure to warn.

**Eleventh Defense**

Plaintiff is not entitled to any special damages to the extent that Plaintiff has failed to specifically plead them in accordance with O.C.G.A. § 9-11-9(g).

**Twelfth Defense**

Plaintiff is not entitled to attorney's fees, expenses, post-judgment interest or pre-judgment interest under the facts of this case. Further, Defendant preserves all rights against Plaintiff to the extent these claims are asserted without any justifiable basis in fact or law.

**Thirteenth Defense**

Pending further investigation and discovery, Defendant reserves the right to assert all affirmative defenses available under the Georgia Civil Practice Act.

**Fourteenth Defense**

In answer to the specific allegations of Plaintiff's Complaint, Defendant shows the Court as follows:

1.

Defendant denies that it is a "joint tortfeasor" or that it has any liability for the damages claimed in this action. Defendant denies that it has a major distribution center in Coffee County, Georgia and shows that this action has no connection with any Walmart Distribution Center. Defendant admits the remaining allegations contained within this paragraph of Plaintiff's Complaint.

2.

Defendant does not have sufficient information at this time to admit or deny the allegations contained within Paragraph 2 of Plaintiff's Complaint, and places Plaintiff on strict proof of same.

3.

Denied as pled. Defendant states that any such duty is established as a matter of Georgia law. Defendant denies all allegations or implications of breach of duty, negligence, and/or liability.

4.

Admitted.

5.

Admitted.

6.

Admitted.

7.

Defendant does not have sufficient information at this time to admit or deny the allegations contained within Paragraph 7 of Plaintiff's Complaint, and places Plaintiff on strict proof of same.

8.

Defendant does not have sufficient information at this time to admit or deny the allegations contained within Paragraph 8 of Plaintiff's Complaint, and places Plaintiff on strict proof of same.

9.

Admitted.

10.

Defendant states that any such duty is established as a matter of Georgia law. Defendant denies all allegations or implications of breach of duty, negligence, and/or liability.

11.

Denied as pled. Further responding, Defendant states that any such duty is established as a matter of Georgia law. Defendant denies all allegations or implications of breach of duty, negligence, and/or liability.

12.

Defendant does not have sufficient information at this time to admit or deny the allegations contained within Paragraph 12 of Plaintiff's Complaint, and places Plaintiff on strict proof of same. Defendant denies all allegations or implications of negligence and/or liability.

13.

Denied.

14.

Discovery and investigation are in early stages and Defendant does not have sufficient information at this time to admit or deny the allegations contained within Paragraph 14 of Plaintiff's Complaint and places Plaintiff on strict proof of same. Defendant denies all allegations or implications of negligence and/or liability.

15.

Denied.

16.

Defendant denies all allegations contained within Plaintiff's "prayer for relief", which appears immediately after the 15<sup>th</sup> paragraph of Plaintiff's Complaint.

17.

Defendant denies all other allegations of the Complaint which have not been specifically responded to in the previous paragraphs.

**DEFENDANT HEREBY DEMANDS TRIAL BY JURY OF TWELVE  
REGARDING ANY ISSUES NOT SUBJECT TO SUMMARY ADJUDICATION.**

Having fully answered, Defendant prays that it be discharged with all costs cast against Plaintiff.

Respectfully submitted, this 11<sup>th</sup> day of January, 2020.

**DREW ECKL & FARNHAM, LLP**

*/s/ Leslie P. Becknell*

---

Michael L. Miller  
Georgia Bar No. 508011  
Leslie P. Becknell  
Georgia Bar No. 046320  
*Attorneys for Defendant Walmart*

303 Peachtree Street, NE  
Suite 3500  
Atlanta, Georgia 30308  
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[mmiller@deflaw.com](mailto:mmiller@deflaw.com)  
[lbecknell@deflaw.com](mailto:lbecknell@deflaw.com)



IN THE SUPERIOR COURT OF COFFEE COUNTY

STATE OF GEORGIA

ANGELA HARRELL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION
	)	FILE NO. SUV2020000619
WALMART STORES EAST L.P. d/b/a	)	
WALMART SUPERCENTER and REDDY	)	
ICE, LLC	)	
	)	
Defendants.	)	
_____	)	

**CERTIFICATE OF SERVICE**

This is to certify that I have this day forwarded, via United States Mail, postage prepaid, a true and correct copy of the foregoing *Walmart Store East L.P.'S Answer and Defenses to Plaintiff's Complaint* to the following counsel of record, addressed as follows:

Brad W. Thomas  
Fried Goldberg, LLC  
3550 Lenox Road, NE  
Suite 1500  
Atlanta, Georgia 30326

This 11<sup>th</sup> day of January, 2020.

**DREW, ECKL & FARNHAM, LLP**

*/s/ Leslie P. Becknell*

\_\_\_\_\_  
Leslie P. Becknell  
Georgia Bar No. 046320  
Attorneys for Defendant Walmart

303 Peachtree Street, NE  
Suite 3500  
Atlanta, Georgia 30308  
(404) 885-1400  
[BecknellL@Deflaw.com](mailto:BecknellL@Deflaw.com)  
11230756/1  
05695-174711